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February 19, 2025

**Via ECF**

Magistrate Judge Leda D. Wettre  
United States District Court – District of New Jersey  
Martin Luther King Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 7101

**RE: Belinda Barthelus v. Wal-Mart Stores, Inc., et al.**  
**Case No. 2:23-cv-22725-WJM-LDW**  
**Our File No. 2521.00097**

Dear Judge Wettre:

This office represents the Defendant Wal-Mart Stores, Inc. in the above-referenced matter. Please accept the following as a status update regarding discovery.

The parties have exchanged written discovery responses. Plaintiff appeared for their independent medical examination with Defendant's expert, and the corresponding expert reports have been served by Defendant. The deposition of Plaintiff took place on February 5, 2025. The parties entered into a Confidentiality Agreement governing the exchange of discovery and all supplemental document production has been produced by Defendant accordingly. At this time, Plaintiff's Counsel indicated that he may seek depositions of Walmart representatives but we have not received any further notices or subpoenas at this time.

Thank you for your continued assistance and attention to this matter.

Respectfully submitted,

BARTON GILMAN LLP

By:

Til J. Dallavalle

TJD/bpo  
Cc: Nicholas P. Scutari, Esq.